

**I UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ALEXANDRE LAING,)	
)	
Petitioner,)	Case No. 1:24-cv-10901
)	
v.)	Judge Martha M. Pacold
)	
JACLYN FORTINI LAING,)	Magistrate Judge Maria Valdez
)	
Respondent.)	

RESPONDENT’S MOTION FOR LEAVE TO SUBSTITUTE COUNSEL

Respondent Jaclyn Fortini Laing (“Respondent”) moves, pursuant to Local Rule 83.17, for leave of the Court to substitute counsel. In support of this request, Respondent states as follows:

1. Current counsel of record for Respondent is David N. Schaffer of Schaffer Family Law, Ltd. (“Withdrawing Counsel”). Withdrawing Counsel first appeared on behalf of Respondent on November 1, 2024 (Dkt. 8).
2. At the request and with the consent of Respondent, Withdrawing Counsel hereby seeks leave to withdraw his appearance on behalf of Respondent in this matter.
3. Respondent wishes to substitute Mary Eileen Cunniff Wells and Rachel Ellen Simon of the law firm Miller Shakman Levine & Feldman LLP (“Substituting Counsel”) as her counsel of record in this matter.
4. Substituting Counsel has been in contact with Withdrawing Counsel in an effort to facilitate a prompt transition that will not occasion material delay on the parties or the case.
5. Withdrawing Counsel has conferred with Petitioner’s counsel of record, who indicated that he does not oppose the substitution request in this Motion.
6. The requested substitution is not sought for purposes of delay.

WHEREFORE, Respondent respectfully requests that the Court grant this Motion, grant leave for the withdrawal of Mr. Schaffer of Schaffer Family Law, Ltd., and grant leave for the substitution of Ms. Wells and Ms. Simon of Miller Shakman Levine & Feldman LLP as counsel of record for Respondent.

Dated: November 13, 2024

Respectfully Submitted,

Withdrawing Counsel:

Substituting Counsel:

Schaffer Family Law, Ltd.

Miller Shakman Levine & Feldman LLP

By: /s/ David N. Schaffer

By: /s/ Mary Eileen Cunniff Wells

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on November 13, 2024, she caused the foregoing **Respondent's Motion for Leave to Substitute Counsel** to be electronically filed with the Clerk of the Court for the United States District Court for the Northern District of Illinois via CM/ECF, and thereby served on all counsel of record.

Dated: November 13, 2024

/s/ Rachel Ellen Simon